

HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

TWIN HARBORS WATERKEEPER,

Plaintiff,

v.

LOCAL MANUFACTURING, INC.,

Defendant.

CASE NO. 3:21-cv-05654-RSM

STIPULATED MOTION TO  
CONTINUE DEADLINES BY THIRTY  
DAYS AND ORDER

NOTE ON MOTION CALENDAR:  
DECEMBER 30, 2021

**STIPULATION**

This matter is a Clean Water Act citizen suit brought under 33 U.S.C. § 1365 by Plaintiff Twin Harbors Waterkeeper (“Twin Harbors”) against Local Manufacturing, Inc. (“Local Manufacturing”). Twin Harbors alleges Local Manufacturing committed numerous violations of its National Pollutant Discharge Elimination System (NPDES) Industrial Stormwater General Permit. Local Manufacturing denies these allegations.

The parties have been assiduously working towards settlement, including involvement by experts to evaluate options for pollution controls, and have reached a settlement in principle. The parties are optimistic that they will reach a compromise resolution and present a proposed consent decree to the Court soon. At this time, the parties believe that it will be more efficient to direct their resources towards continued settlement discussions rather than trial preparation

activities and associated Court involvement. For that reason, the parties request that all deadlines be extended by thirty days.

The Court's November 17, 2021 Minute Order set the deadlines for the FRCP 26(f) Conference for December 22, 2021; Initial Disclosure for December 29, 2021; and Joint Status Report for January 5, 2022. The parties propose to continue the deadlines for the FRCP 26(f) Conference to January 21, 2022; Initial Disclosure to January 28, 2022; and Joint Status Report to February 4, 2022.

RESPECTFULLY SUBMITTED this 30th day of December, 2021.

**SMITH & LOWNEY, PLLC**

By: s/Savannah Rose  
Savannah Rose, WSBA No. 57062  
Meredith A. Crafton, WSBA No. 46558  
Richard A. Smith, WSBA No. 21788  
2317 E. John St.  
Seattle, WA 98112  
Tel: (206) 860-2883  
Fax: (206) 860-4187  
Email: savannah@smithandlowney.com  
meredith@smithandlowney.com  
richard@smithandlowney.com  
*Attorneys for Plaintiff Twin Harbors Waterkeeper*

**STOEL RIVES LLP**

By: s/Beth S. Ginsberg  
Beth S. Ginsberg, WSBA No. 18523  
Veronica M. Keithley, WSBA No. 52784  
Attorneys for Defendants  
600 University Street, Suite 3600  
Seattle, WA 98101  
Tel: (206) 624-0900  
Fax: (206) 386-7500  
Email: beth.ginsberg@stoel.com  
veronica.keithley@stoel.com  
*Attorneys for Defendant Local Manufacturing, Inc.*

ORDER

This matter having come before the Court on the parties' stipulated motion for continuance of the deadlines for the FRCP 26(f) Conference, Initial Disclosure, and Joint Status Report, and the Court having reviewed the file and pleadings herein, and being otherwise fully advised on the matter, hereby finds and concludes that good cause exists to continue the deadlines for the FRCP 26(f) Conference, Initial Disclosure, and Joint Status Report by thirty days. The schedule set forth in The Court's November 17, 2021 Minute Order is amended; the deadlines for the FRCP 26(f) Conference is January 21, 2022; Initial Disclosure is January 28, 2022; and Joint Status Report to February 4, 2022.

IT IS SO ORDERED

DATED this 3<sup>rd</sup> day of January, 2022.



RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

**SMITH & LOWNEY, PLLC**

By: s/Savannah Rose  
Savannah Rose, WSBA No. 57062  
Meredith A. Crafton, WSBA No. 46558  
Richard A. Smith, WSBA No. 21788  
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on December 30, 2021, I caused the foregoing document to be electronically filed with the Clerk of the Court using CM/ECF system which will send notification of the filing to all counsel of record.

By: s/Savannah Rose  
Savannah Rose, WSBA No. 57062  
SMITH & LOWNEY, PLLC